

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

VICENTE CAMACHO

VS.

TYSON FOODS, INC. and
TYSON FARMS, INC.

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CIVIL ACTION NO. 2:14-CV-562-JRG

PLAINTIFF'S SECOND AMENDED PRE-TRIAL DISCLOSURES

Plaintiff, VICENTE CAMACHO, makes these Pretrial Disclosures as required by the Federal Rules of Civil Procedure and pursuant to the Court's Second Amended Docket Control Order dated March 11, 2015.

A. The name and, if not previously provided, the address and telephone number of each witness, separately identifying those whom the party expects to present at trial and those whom the party may call if the need arises.

Name	Will Call	May Call
Vicente Camacho	X	
Patricia Camacho	X	
Jeremy Moore	X	
Vernon Morgan	X	
Adriana M. Strutt, PhD	X	
Gary D. Kronrad, PhD	X	
Dan Bagwell, Dr. David Altman	X	
J.P. Purswell, PhD., P.E., CPE	X	

Dr. Jinny Narula, Dr. Kenneth Tan, employees and/or custodian of medical records		X
Diane McFarland, PT, employees and/or custodian of medical records		X
Perry Upshaw King, Financial Counselor/medical eligibility, employees and/or custodian of medical records		X
Dr. Kevin Tomisc, employees and/or custodian of medical records		X
John Berne, MD, Lashonda L. Williams, MD, Dr. Peter Detwiler, Dr. Clinton Pace, MD, Dr. Reza Sharifi, MD, Brian H. Stone, DDS, Gregory Kiblinger, MD, Douglas Macha, MD, Alfred D. Llave, MD, Greg A. Schultz, MD, Robert Sanchez, MD, Charles D. Crum, MD, Thomas Hayes, MD, employees and/or custodian of medical records		X
Garvin H. Davis, MD, Nan Wang, M D, PHD, employees and/or custodian of medical records		X
Maritza J. Figueroa, Ph.D., Dr. David Scott Wolf, Dr. Ron Tintner, Nelson V Valena, MD, Jude Theriot, MD, including employees and/or custodian of medical records		X
Dr. Neal Haynes, and the employees and/or custodian of medical records		X
James Cain, MD, and the employees and/or custodian of medical records		X
Southlake Radiology, Employees and/or custodian of medical records		X
Dr. Mohammad El-Zufari, MD, John W. Cassidy, MD, and Ron Tintner, MD, including employees and/or custodian of medical records		X

Ronald M. Zweighaft, MD, and Grant R. McKeever, MD, and the employees and/or custodian of medical records		X
Dr. Mark Cline, employees and/or custodian of medical records		X
Corey Johnson		X
Frank McCollister		X
Alejandro Munoz		X
QSI, A Member of the Vincit Group, including corporate representative and/or custodian of records		X
Tim Aponte		X
Kevin Arbogast		X
Brenda Fleets		X
Ben Hope		X
Fuji Ortiz		X
Gabriel Rivas		X
Scott Ruff		X

B. The designation of those witnesses whose testimony is expected to be presented by means of a deposition and, if not taken stenographically, a transcript of the pertinent portions of the deposition testimony.

Witness	Page/Line Designations
Oral Deposition of Jeremy Moore, taken March 3, 2014 (Depo No. 1)	See Exhibit “A”, previously submitted with Plaintiff’s First Amended Pretrial Disclosures
Oral Deposition of Jeremy Moore, taken February 3, 2015 (Depo No. 2)	See Exhibit “B”, previously submitted with Plaintiff’s First Amended Pretrial Disclosures
Oral Deposition of Vernon Morgan, taken December 30, 2014	See Exhibit “C”, previously submitted with Plaintiff’s First Amended Pretrial Disclosures

C. An appropriate identification of each document or other exhibit, including summaries of other evidence, separately identifying those which the party expects to offer and those which the party may offer if the need arises.

Exhibit No.	Description	Marked	Admitted	Expects to Offer	May Offer
1.	Sanitation Services Agreement TYS0002-0023		X		
2.	Tyson's Core Safety Mandates Policy TYS00025		X		
3.	Tyson Foods Statement Regarding Compliance with Safety and Health Regulations and Required Training TYS0029		X		
4.	Tyson Foods, Inc. Center, Texas and Nacogdoches, Texas Contractor Safety Handbook TYS0044-45, 0047-0049, 0064-65		X		
5.	Inspection Planned Orders TYS0074-93		TYS0074-88	TYS0089-93	
6.	Photographs TYS0102,103,105-109		X		
7.	E-mail from Cory Johnson to Wesley Permenter TYS0115		X		
8.	E-mail from Wesley Permenter to Ty Price, dated August 4, 2012 TYS0119		X		
9.	E-mail from Cory Johnson to Wesley Permenter TYS0120-0122		X		
10.	Photographs TYS0219-0220		TYS0219	TYS0220	

11.	Picture of Valve		X		
12.	Purchase Orders TYS0232-0539			X TYS0232-0539	
13.	Deposition on Written Questions to QSI, A Member of Vincit Group TYS0582-592,0594,0596-598, 0600-0603		TYS0582-0588, 0596-0598, 0600-0603	TYS0589-592, TYS0594	
14.	Tyson Center Plant Schematics TYS0621-0622		X		
15.	Tyson Foods 10-K			X	
16.	Purchase Order Summary			X	
17.	Summary of Medical Expenses		X		
18.	Medical Records of Roel Pena aka Vicente Camacho from Shelby Regional Medical Center		X		
19.	Medical Records of Roel Pena aka Vicente Camacho from ETMC Trauma Services		X		
20.	Medical Records of Roel Pena aka Vicente Camacho from Robert Cizik Eye Clinic		X		
21.	Medical Records of Roel Pena aka Vicente Camacho from Westbelt Medical-Neurological		X		
22.	PowerPoint Presentation – Incident Summary TYS0686-0689		X		
23.	Order Regarding Plaintiff's Motion to Compel Discovery Responses			X	

Respectfully submitted,

BADDERS LAW FIRM, PC
4002 North Street
Nacogdoches, Texas 75965
936-564-6181 (telephone)
936-564-8095 (facsimile)

/s/ Jeff Badders
Jeff B. Badders
Bar I. D. No. 01496850
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this instrument has been forwarded to the Defendant's attorney via facsimile on this the 15th day of April, 2015.

/s/ Jeff Badders
Jeff B. Badders